

**STATEMENT OF PURPOSE:**

All schools are required to have a bloodborne pathogens exposure control plan. Universal precautions are to be utilized with all students and with any exposure to blood or bodily fluids.

**AUTHORIZATION/LEGAL REFERENCE:**

21 V.S.A. § 201 – Occupational policy

<http://legislature.vermont.gov/statutes/section/21/003/00201>

21 V.S.A. § 224 – Rules and standards

<http://legislature.vermont.gov/statutes/section/21/003/00224>

29 CFR 1910.1030 – Bloodborne Pathogens - U.S. Department of Labor: Occupational Safety and Health Administration

[http://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=STANDARDS&p\\_id=10051](http://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=STANDARDS&p_id=10051)

Vermont Agency of Education – VT Standards Board for Professional Educators 5440-65/65A School Nurse/ Associate School Nurse (April 12, 2017) <http://education.vermont.gov/documents/educator-quality-licensing-rules#page34> pg. 132- 137

**DEFINITION:**

**Bloodborne Pathogens Exposure Control Plan** - Each employer having an employee(s) with anticipated occupational exposure to bloodborne pathogens shall establish a written Exposure Control Plan designed to eliminate or minimize employee exposure. The Plan will be developed in accordance to OSHA Standards for Bloodborne Pathogens as listed in the above reference.

**REQUIRED SCHOOL NURSE/ASSOCIATE SCHOOL NURSE ROLES:**

- Review school's bloodborne pathogens exposure control plan, annually; alert administration of new guidelines as necessary.
- Develop safe practices for disposal of needles, other sharps and contaminated waste and work with school administrators to implement them.
- Establish procedures for use of personal protective equipment for cleaning blood and body fluid spills and proper disposal; inform appropriate staff in procedure as needed. Work with school administrators to implement procedures and protocols
- It is best if the sink used for cleaning of blood injuries is located away from refrigerator, medicine cabinet and any eating surfaces.
- Provide information to students and staff about safe practices when injuries occur on school grounds or school bus. Implement post exposure control plan in the event of blood or bodily fluid exposure.

**SUGGESTED SCHOOL NURSE/ASSOCIATE SCHOOL NURSE ROLES:**

- Act as a resource for bloodborne pathogen annual staff training
- Provide first aid kits to classroom teachers, recess duty staff, bus drivers and staff on field trips which include gloves/protective barriers and bandaging supplies.

**RESOURCES:**

Caring for Our Children: National Health and Safety Performance Standards 3.2.3.4: Prevention of Exposure to Blood and Body Fluids <http://nrckids.org/index.cfm/products/stepping-stones-to-caring-for-our-children-3rd-edition-ss3/stepping-stones-to-caring-for-our-children-3rd-edition-ss3/> pg. 39. See also cleaning, sanitizing and disinfecting

Centers for Disease Control and Prevention: Bloodborne Pathogens ([National Institute for Occupational Safety and Health](http://www.cdc.gov/niosh/docs/2004-101/chklists/n77blo~1.htm) Education and Information Division)

- Healthcare-associated Infections (HAIs) <http://www.cdc.gov/HAI/settings/outpatient/basic-infection-control-prevention-plan-2011/transmission-based-precautions.html>
- Guide to Infection Prevention for Outpatient Settings: Minimum Expectations for Safe Care <http://www.cdc.gov/HAI/settings/outpatient/outpatient-care-guidelines.html>
- Self-Inspection Checklist <http://www.cdc.gov/niosh/docs/2004-101/chklists/n77blo~1.htm>
- Healthcare Infection Control Practices Advisory Committee (HICPAC) <http://www.cdc.gov/hicpac/2007IP/2007isolationPrecautions.html>

Food and Drug Administration of the U.S. (2016) *Safely Using Sharps (Needles and Syringes) at Home, at Work and on Travel* <http://www.fda.gov/MedicalDevices/ProductsandMedicalProcedures/HomeHealthandConsumer/ConsumerProducts/Sharps/default.htm>

[Managing Infectious Diseases in Child Care and Schools, 4th Ed: A Quick Reference Guide](#)

Edited by Susan S. Aronson, MD, FAAP and Timothy R. Shope, MD, MPH, FAAP

... 978-1-61002-050-3 9781610020510 978-1-61002-051-0 aapbk;9781610020510/1 9781610020503 Managing Infectious Diseases in Child Care and Schools, 4th Ed Managing Infectious Diseases in Child Care and Schools, 4th Ed | A Quick Reference Guide, Book | Published in 2016 ISBN (electronic): 978-1-61002-051-0

Vermont Department of Health HIV program

[http://www.healthvermont.gov/prevent/aids/aids\\_index.aspx](http://www.healthvermont.gov/prevent/aids/aids_index.aspx)

U.S. Department of Labor: Occupational Safety and Health Administration

[https://www.osha.gov/SLTC/bloodbornepathogens/bloodborne\\_quickref.html](https://www.osha.gov/SLTC/bloodbornepathogens/bloodborne_quickref.html)

OSHA Fact Sheet: [https://www.osha.gov/OshDoc/data\\_BloodborneFacts/bbfact01.html](https://www.osha.gov/OshDoc/data_BloodborneFacts/bbfact01.html)

OSHA Interpretation:

[https://www.osha.gov/pls/oshaweb/owadisp.show\\_document?p\\_table=INTERPRETATIONS&p\\_id=24779](https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=INTERPRETATIONS&p_id=24779)

OSHA BBP webpage @ <https://www.osha.gov/SLTC/bloodbornepathogens/index.html>

## SAMPLE POLICIES, PROCEDURES AND FORMS:

### Bloodborne Pathogens: Self-Inspection Checklist

<http://www.cdc.gov/niosh/docs/2004-101/chklists/n77blo~1.htm>

#### Definition

*Occupational Exposure* means reasonably anticipated skin, eye, mucous membrane, or parenteral contact with blood or other potentially infectious materials that may result from the performance of an employee's duties. That definition goes farther than actual exposure and includes the concept of "reasonably anticipated." This requires the employer to evaluate employees' jobs and determine if they could be reasonably exposed during the course of their employment activities. I do have a link to the NIOSH checklist for schools to assist you.

<http://www.cdc.gov/niosh/docs/2004-101/chklists/n77blo~1.htm> (12/1/16, personal communication, Daniel Whipple, OHST, VOSHA Program Manager, Montpelier, VT)

### Sample Compliance Assistance from the Vermont Department of Labor

<http://labor.vermont.gov/vosha/compliance-assistance/>

What is VOSHA Compliance Assistance?

VOSHA Compliance Assistance is the outreach arm of the Vermont Occupational Safety and Health Agency. Compliance Assistance Specialists can provide general information about VOSHA standards and compliance assistance resources. They respond to requests for help from a variety of groups, including small businesses, trade associations, union locals, and community and faith-based groups. There is one Compliance Assistance Specialist in each OSHA Area Office in states under federal jurisdiction. They are available for seminars, workshops, and speaking events. They promote cooperative programs, such as Consultation Programs, the Voluntary Protection Programs, the Strategic Partnerships Program, and the Alliance Program. They also promote OSHA's training resources and the tools available on the OSHA web site. The Compliance Assistance Specialist for Vermont is Daniel Whipple and he can be reached at (802) 334-4367 or email at [dan.whipple@vermont.gov](mailto:dan.whipple@vermont.gov)

### Sample HIV Policy

<http://education.vermont.gov/sites/aoe/files/documents/edu-healthy-safe-schools-hiv-model-policy.pdf> (Revised: 8/19/16)

### Sample Blood Borne Pathogen Exposure Control Plan (Madison Public School District)

[http://www.madisonpublicschools.org/cms/lib7/NJ01000205/Centricity/Domain/47/Blood\\_Borne\\_Pathogen\\_Exposure\\_Control\\_Plan\\_Madison\\_Public\\_Schools-REVISED.pdf](http://www.madisonpublicschools.org/cms/lib7/NJ01000205/Centricity/Domain/47/Blood_Borne_Pathogen_Exposure_Control_Plan_Madison_Public_Schools-REVISED.pdf)

### Sample OSHA Bloodborne Pathogens and Hazard Communication Standards

<https://www.osha.gov/Publications/osha3186.html>

**Sharps Containers in School** c/o Debra Pierce, Environmental Engineer IV, Agency of Natural Resources, personal communications June 9, 2017

The used sharps are not considered Hazardous Waste, they fall under Regulated Medical Waste. While there are new Hazardous Waste Rules in place, there has not been a change in the Solid Waste Management Rules where the Regulated Medical Waste applies. The schools should continue as they have been until there are changes in the Rules.

Procedure Addressing Regulated Medical Waste (RMW) Definitions and the Handling and Treatment of RMW (referenced as the **RMW Procedures below**) can be found at:

<http://www.anr.state.vt.us/dec/wastediv/solid/pubs/MedWaste.pdf>

**1) To address how to dispose of minor spills including vomit:**

- By definition, these spills are not considered RMW **unless they contain visible blood** so RMW Procedures do not govern, see page 3 under the definition of RMW (a)(2)(B):

*“Other potentially infectious liquid body fluids, including cerebrospinal fluid, synovial, pleural, peritoneal and amniotic fluid; not including nasal secretions, sputum, tears, sweat, urine, and vomitus unless they contain visible blood”*

**2) To address how to dispose of bags after a blood spill:**

- By definition, these spills are considered RMW, see page 3 under the definition of RMW (a)(2)(C):

*“Items saturated or dripping with blood or with potentially infectious body fluids and those caked with dried blood or with potentially infectious dried body fluids.”*

- It has been the practice in the past that, **when the amount of blood is minimal**, absorbent materials are added to the bag and then the bags are sealed and safely disposed of in the dumpster.

**3) To address where is the language specifying the use of red bags:**

- The color of the bags is **not specified**, only that they need to prevent leaking, see page 6 under Section 3 (II)(b) and (c):

Section (II)(b)(2) Refers to Packaging:

*“(2) Containers shall not be leaking when shipped.”*

**4) To address the disposal of sharps containers:**

Open the top of the container that is filled with used sharps (if it is a “red box” or a detergent bottle)

- Fill the container with a type of plaster like Plaster of Paris
- Place top back on container and ensure it is closed securely by duct taping the edges
- Cover any existing labels with a label that says “USED SHARPS” to ensure the receiving facility understands what it contains (if it is a “red box”) or with a label that says “DO NOT RECYCLE” (if it is a detergent bottle)

**Sharps Containers for Home Use** c/o Debra Pierce, Environmental Engineer IV, Agency of Natural Resources, personal communications June 9, 2017

[http://www.healthvermont.gov/sites/default/files/documents/2016/12/ID\\_hepC\\_prevention\\_sharps\\_disposal\\_flyer.pdf](http://www.healthvermont.gov/sites/default/files/documents/2016/12/ID_hepC_prevention_sharps_disposal_flyer.pdf)

**Standard Precautions Compliance Assessment Tool**

[https://www.google.com/url?q=http://apic.org/Resource/\\_TinyMceFileManager/Academy/ASC\\_101\\_resources/Assessment\\_Checklist/Standard\\_Precautions\\_Compliance\\_Assessment\\_Tool.doc&sa=U&ved=0ahUKEwiW47232cbPAhXFTSYKHd70A6cQFggMMAM&client=internal-uds-](https://www.google.com/url?q=http://apic.org/Resource/_TinyMceFileManager/Academy/ASC_101_resources/Assessment_Checklist/Standard_Precautions_Compliance_Assessment_Tool.doc&sa=U&ved=0ahUKEwiW47232cbPAhXFTSYKHd70A6cQFggMMAM&client=internal-uds-)

[cse&usg=AFQjCNFPKWDX6X4u58Wnef51Et5xeHmAKg](#)

### Sample Training Materials

(Wisconsin Improving School Health Services Project [WiSHes]) Infection Control

[http://c.ymcdn.com/sites/www.wpha.org/resource/resmgr/WiSHES\\_Project/Injury\\_and\\_Illness\\_Protocols.pdf](http://c.ymcdn.com/sites/www.wpha.org/resource/resmgr/WiSHES_Project/Injury_and_Illness_Protocols.pdf) (pg.6)

Bloodborne Pathogens School Training Program: Wisconsin Department of Public Instruction

<http://dpi.wi.gov/sspw/pupil-services/school-nurse/training>